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United States Attorney Southern District of New York

86 Chambers Street New York, New York 10007

August 17, 2020

## By CM/ECF

Honorable Gregory H. Woods United States District Judge United States Courthouse 500 Pearl St. New York, New York

Application GRANTED. SO ORDERED.

Dated: August 17, 2020

Re:

Espino vs. Commissioner of Social Security Civil Action No. 20-cv-02426 (GHW-SDA)

Dear Judge Woods:

This Office represents the Commissioner of Social Security (Commissioner) in the above-referenced action pursuant to 42 U.S.C. § 405(g), challenging a decision by the Commissioner to deny plaintiff's application for program benefits. I respectfully request a thirty day extension of the Commissioner's deadline to file the certified administrative record, from August 24, 2020 to September 23, 2020.

This is the Commissioner's first request for an extension. The extension is necessary because of delays in preparing the certified administrative record due to the telecommuting and other temporary workplace changes implemented by the Social Security Administration in response to the pandemic. Plaintiff consents to the requested extension. Thank you for Your Honor's consideration of this request.

Respectfully submitted.

**AUDREY STRAYSS** Acting United States Attorney

/s/ Benil Abraham By:

> Benil Abraham Special Assistant United States Attorney c/o Social Security Administration Office of General Counsel

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cc: Daniel Berger, Esq.